

Patrick Cruise

From: Patrick Cruise
Sent: Monday, June 1, 2020 11:49 AM
To: Dan Ripper
Subject: RE: Bass
Attachments: 2020 W-9.pdf

Dan, attached is our W-9.

Patrick

From: Dan Ripper <dan@lutheranderson.com>
Sent: Monday, June 1, 2020 11:38 AM
To: Patrick Cruise <pac@thehamiltonfirm.com>
Subject: Re: Bass

I need your tax ID too

Dan Ripper
Luther-Anderson, PLLP
100 W. ML King, Suite 700
Chattanooga, TN 37402
423-756-5034
423-991-7477(cell)

On May 30, 2020, at 8:11 PM, Patrick Cruise <pac@thehamiltonfirm.com> wrote:

Dan, we have deal at 30k in exchange for dismissal with prejudice and general release. Check should be payable to crystina bass, chris bass, and the Hamilton firm.

Sincerely,

<signature_Drawing_1550241817411.png>

Patrick A. Cruise
The Hamilton Firm
2401 Broad Street, Suite 102
Chattanooga, TN 37408
423 634 0871



Patrick Cruise

From: Dan Ripper <dan@lutheranderson.com>
Sent: Monday, June 22, 2020 9:12 PM
To: Patrick Cruise
Subject: RE: bass v. p&G

Prepare a dismissal you are happy with and we will use that. Modify the release as you need and get it executed so I can get the check.

Daniel J. Ripper
Luther-Anderson, PLLP



100 W. Martin Luther King Blvd., Suite 700
PO Box 151
Chattanooga, TN 37402
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423-991-7477 (cell)
423-265-9903 (fax)

From: Patrick Cruise <pac@thehamiltonfirm.com>
Sent: Monday, June 22, 2020 8:43 PM
To: Dan Ripper <dan@lutheranderson.com>
Subject: RE: bass v. p&G

Dan, I'm ok with the release but it says check already received. I'm also not sure your dismissal is correct for federal court. It's typically done as a stipulation not an order.

Sincerely,

Patrick A. Cruise
The Hamilton Firm
2401 Broad Street, Suite 102
Chattanooga, TN 37408
423 634 0871

----- Original message -----

From: Dan Ripper <dan@lutheranderson.com>
Date: 6/22/20 8:02 PM (GMT-05:00)
To: Patrick Cruise <pac@thehamiltonfirm.com>

Subject: RE: bass v. p&G

Checking on the status of the checks I have been advised I need a signed release. See attached the release and dismissal

Daniel J. Ripper
Luther-Anderson, PLLP



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From: Patrick Cruise <pac@thehamiltonfirm.com>
Sent: Friday, June 19, 2020 2:52 PM
To: Dan Ripper <dan@lutheranderson.com>
Subject: bass v. p&G

Dan, do you have the check yet? I'm ready to put this one to bed – it's my oldest case by a longshot.

Patrick A. Cruise*

The Hamilton Firm
2401 Broad Street, Suite 102
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Phone: (423) 634-0871
Fax: (423) 634-0874

**Licensed in Tennessee, Georgia and Louisiana*



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Patrick Cruise

From: Dan Ripper <dan@lutheranderson.com>
Sent: Wednesday, June 24, 2020 3:34 PM
To: Patrick Cruise
Subject: RE: bass v. p&G
Attachments: RELEASE OF ALL CLAIMS -PG PC version.doc

I changed a comma or two

Daniel J. Ripper
Luther-Anderson, PLLP



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From: Patrick Cruise <pac@thehamiltonfirm.com>
Sent: Wednesday, June 24, 2020 12:33 PM
To: Dan Ripper <dan@lutheranderson.com>
Cc: Patrick Cruise <pac@thehamiltonfirm.com>
Subject: RE: bass v. p&G

Dan, I have made a few revisions. Please see attached. I am sending to my clients for signature.

Patrick A. Cruise*

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Patrick Cruise

From: Patrick Cruise
Sent: Thursday, July 2, 2020 3:24 PM
To: Dan Ripper
Subject: RE: bass v. p&G
Attachments: P&G signed release.pdf

Dan, see attached executed release. I trust check is on the way.

Patrick A. Cruise*

The Hamilton Firm

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From: Dan Ripper <dan@lutheranderson.com>
Sent: Wednesday, June 24, 2020 3:34 PM
To: Patrick Cruise <pac@thehamiltonfirm.com>
Subject: RE: bass v. p&G

I changed a comma or two

Daniel J. Ripper
Luther-Anderson, PLLP



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RELEASE OF ALL CLAIMS

IN CONSIDERATION of the sum of Thirty Thousand Dollars and 00/100 (\$30,000.00), receipt of which is hereby acknowledged, **Crystina Bass, Christopher Bass**, for myself, successors, and assigns does hereby release and forever discharge **Procter & Gamble Distributing, LLC, Procter & Gamble Manufacturing Company, Procter & Gamble Company, and, Procter & Gamble**, their agents, and insurers for all current or future claims, controversies, consortium claims, demands, costs, expenses, obligations, actions or causes of action, on account of personal injuries and property damage whether known or unknown, whether paid or unpaid, whether developed or undeveloped, whether accrued or not yet accrued, of whatever nature now existing or which may hereafter arise out of a motor vehicle accident which occurred March 12, 2016 at or around Interstate 24 Eastbound in Marion County, Tennessee.

IN FURTHER CONSIDERATION of the above sum, the undersigned agrees to dismiss, with prejudice, *Bass v. Bobo Transportation, et al*, Case No. 1:17-cv-00108 (E.D.Tenn.).

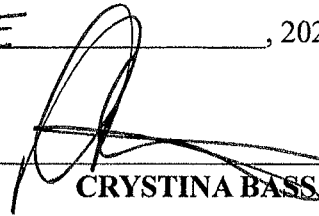
IT IS EXPRESSLY UNDERSTOOD AND AGREED that this settlement is a compromise of a doubtful and disputed claim and that payment made is not to be construed as an admission of liability on the part of the parties hereby released and that said parties hereby released deny liability therefore.

THE UNDERSIGNED FURTHER AGREES to pay any and all valid and legally enforceable liens owing from the claim and to indemnify, defend and hold harmless **the above named released parties** in the event any such subrogation claims or liens are not paid. Said liens or subrogation claims are the sole responsibility of the undersigned.

IT IS FURTHER EXPRESSLY UNDERSTOOD AND AGREED that this release and that the terms of this release are contractual in nature and are not a mere recital, and that all parties have entered into this release in the good faith belief that it is fair and reasonable compromise of the undersigned's claims.


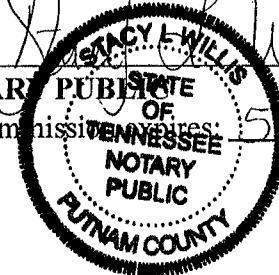
THE UNDERSIGNED HAVE READ THE FOREGOING RELEASE IN FULL AND HEREBY REPRESENT THAT THEY UNDERSTAND IT.

Executed this 25 day of JUNE, 2020.


CRYSTINA BASS


CHRISTOPHER BASS

Sworn to and subscribed before me this
25 day of June, 2020.


NOTARY PUBLIC
My commission expires: 5/22/2024


Patrick Cruise

From: Dan Ripper <dan@lutheranderson.com>
Sent: Wednesday, July 15, 2020 4:00 PM
To: Patrick Cruise
Subject: RE: bass v. P&G

I do not because I was told today that Exel will not accept the release as signed because it does not contain them as a released party. I will need to get your release that includes XL in a manner that is acceptable to them. Frankly I don't understand it because the statute of limitations has passed and the entity is not even a party to the lawsuit, but since they picked up the indemnification they believe they should also be on the release.

Daniel J. Ripper
Luther-Anderson, PLLP



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From: Patrick Cruise <pac@thehamiltonfirm.com>
Sent: Wednesday, July 15, 2020 3:33 PM
To: Dan Ripper <dan@lutheranderson.com>
Subject: bass v. P&G

Dan, do you have the check?

Patrick A. Cruise*

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